

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

MILLENNIUM FUNDING, INC., *et al*,

Plaintiffs,

v.

WICKED TECHNOLOGY LIMITED d/b/a
VPN.HT, *et al.*,

Defendants.

Civil Action No. 1:21-cv-00282-RDA-TCB

**PLAINTIFFS' EX PARTE MOTION FOR TEMPORARY ASSET RESTRAINT,
PRELIMINARY INJUNCTION AND EXPEDITED DISCOVERY**

Plaintiffs MILLENNIUM FUNDING, INC., EVE NEVADA, LLC, HUNTER KILLER PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., GUNFIGHTER PRODUCTIONS, LLC, MILLENNIUM IP, INC., VOLTAGE HOLDINGS, LLC, KILLING LINK DISTRIBUTION, LLC, LHF PRODUCTIONS, INC., RAMBO V PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., WONDER ONE, LLC and 42 VENTURES, LLC (“Plaintiffs”), by and through their counsel, hereby move for a Temporary Restraining Order, including a temporary asset restraint and expedited discovery pursuant to 17 U.S.C. § 502(a) and Fed. R. Civ. P. 65.

For the reasons set forth in Plaintiffs’ accompanying memorandum, Plaintiffs respectfully request that this Court: (1) issue a temporary restraining order ordering Paypal, Inc. to freeze the PayPal accounts owned or controlled by Defendants WICKED TECHNOLOGY LIMITED (“Wicked”), VPN.HT Limited (“VPN.HT”), and MOHAMED AMINE FAOUANI (“Faouani”) (Wicked, VPN.HT and Faouani referred to collectively below as the “Wicked Defendants”); and further ordering Google, or its reseller, to lock the domain name POPCORNTIME.APP owned by

Defendant JOHN OR JANE DOE d/b/a POPCORNTIME.APP (“Doe”) to prevent transfer to a third party; (2) issue an order to show cause why said temporary restraining order should not become a preliminary injunction; and (3) permit limited expedited discovery directed to PayPal, GitHub and Cloudflare in order to determine the amount and location of the profits of the Wicked Defendants’ infringements, and the scope of their activities, and Doe’s identity.

Dated: March 31, 2021

Respectfully submitted,

/s/ Timothy B. Hyland
Timothy B. Hyland
Virginia Bar No. 31163
Counsel for Plaintiffs
HYLAND LAW PLLC
1818 Library Street, Suite 500
Reston, VA 20190
Tel.: (703) 956-3566
Fax: (703) 935-0349
Email: thyland@hylandllc.com

Kerry S. Culpepper, *pro hac vice*
Hawaii Bar No. 9837
Virginia Bar No. 45292
Counsel for Plaintiffs
CULPEPPER IP, LLLC
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawai'i 96740
Tel.: (808) 464-4047
kculpepper@culpepperip.com